

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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NANCY WILSON, Regional Director
of the Sixth Region of the
National Labor Relations Board,
for and on behalf of the
NATIONAL LABOR RELATIONS BOARD,

Petitioner

v.

Civil Number 1:18-cv-65

KRISE TRANSPORTATION, INC.

Respondent

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**MOTION FOR LEAVE TO EXCEED PAGE LIMIT WHEN
FILING MEMORANDUM OF POINTS AND AUTHORITIES**

Now comes Counsel for the Petitioner and hereby moves this Honorable Court to allow Petitioner to exceed the page limit when filing its Memorandum of Points and Authorities in Support of Complaint and Petition for Temporary Injunction under Section 10(j) of the National Labor Relations Act and in support thereof states as follows:

1. Petitioner filed a Complaint and Petition for Temporary Injunction under Section 10(j) of the National Labor Relations Act on February 27, 2018 (“the Petition”).
2. In support of the Petition, Petitioner intends to file a Memorandum of Points and Authorities.

3. Requests for injunctions under Section 10(j) of the National Labor Relations Act, as amended, (“the Act”) are not routinely filed in this Court.

4. Petitioner hereby requests leave to exceed the page limit for briefs by twenty pages, allowing the filing of its Memorandum of Points and Authorities of up to forty-five pages in length to allow for full explanation of the underlying facts as well as an analysis of the law which supports the Petition for injunctive relief under Section 10(j) of the Act.

WHEREFORE, for all the foregoing reasons, Petitioner submits that this Court should allow Petitioner to exceed the page limit for briefs by twenty pages, to allow for Petitioner’s Memorandum of Points and Authorities in Support of Complaint and Petition for Temporary Injunction Under Section 10(j) of the National Labor Relations Act with a page limit of forty-five pages.

Dated at Pittsburgh, Pennsylvania, this 28th day of February, 2018.

Respectfully submitted,

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